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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

:

Debtors. : (Jointly Administered)

:

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NOTICE OF JOINT PLAN FOR THE SUNCAL INVOLUNTARY CASES EMBODYING SETTLEMENT WITH SUNCAL TRUSTEE ON BEHALF OF SUNCAL INVOLUNTARY DEBTORS

On September 29, 2010, the Debtors filed the *Motion of the Debtors Pursuant to Section 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 9019 for Authority to Enter into Settlement with SunCal Trustee on Behalf of SunCal Involuntary Debtors* (the "Motion") [Docket No. 11688]. Pursuant to the Motion, the terms of the SunCal Involuntary Settlement are to be embodied in the Joint Plan to be proposed in the SunCal Involuntary Debtor Cases by the SunCal Trustee and the Lehman Creditors. Subsequent to the filing of the Motion, the Lehman Creditors and the SunCal Trustee finalized and filed the Joint Plan and a related disclosure statement (the "Disclosure Statement") with the California Bankruptcy Court.

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Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Motion.

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PLEASE TAKE NOTICE that the Debtors hereby file copies of the Joint Plan and the Disclosure Statement, which are attached hereto as Exhibit A and Exhibit B, respectively.

Dated: October 4, 2010 New York, New York

/s/ Alfredo R. Pérez

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Exhibit A

See Attached.

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Exhibit B

See Attached.